

# PCB Approval Process For The Following Categories:

1. PCB incinerators 761.70
2. High efficiency boilers 761.71
3. Alternate thermal methods 761.60e
4. PCB landfills 761.75
5. PCB commercial storage 761.65
6. Risk-based clean-up under 761.61c and 62c
7. R&D approvals 761.60j
8. Alternate decontamination procedures 761.79h

# Region 6 PCB Approval Score Board

- COMMERCIAL APPROVALS
- 2 incinerators (3 nationally)
- 1 metal re-claim furnace
- 1 de-chlorination process
- 1 landfill
- 9 storage facilities

# Region 6

- Region 6 has about 24% of the fixed national commercial disposal and commercial storage capacity.

# Region 6 PCB Approval Score Board

- Non-commercial approvals
- 7 incinerators
- 5 landfills
- 5 boilers
- 5 61(c)

# What's In An Approval Package

- Approval letter and conditions.
- Supporting documentation, including justification for any waiver requests granted.
- For issue resolution, Lou and I consult the Oracle (John H), or the Architect (6ORC or OGC) to keep everyone in the Matrix.
- Fact sheet with staff recommendations.
- Public notice draft.
- Concurrences.

# Concurrences/Signatures

1. Me
2. Lou Roberts
3. Any other staff member and their Section Chief
4. My Section Chief-Darrin Swartz-Larson
5. RCRA Associate Director- Steve Gilrein
6. M2P2 Director- Carl Edlund

# PCB Incinerator Process

- Site visit.
- Application and test burn plan.
- Test burn/risk analysis-PCB coplaner congeners.
- Submit report.
- Proposed approval.
- PN/final approval- 1 year +.

# Risk Burns/Risk Assessments

- Region 6 wants risk burns to go with PCB incinerator approvals.
- Risk burns may be combined with HWC MACT tests.
- Risk burns must include all wastes burned including PCBs.
- Co-planer PCBs are factored into the risk assessment.
- EPA does the risk assessment.
- Risk burns can significantly delay final approvals.

# Public Participation Process

- Public notice with 45-day comment period announcing proposed approval.
- If significant or substantial comments, public hearing.
- 30-day advance notice of hearing in local area.
- Response to comments.
- Final decision.

# High Efficiency Boilers

- For 50-500 ppm PCBs of mineral oil dielectric fluid, notify EPA that boiler meets regulatory criteria. EPA will conduct site visit to verify and give written confirmation that boiler meets criteria.
- For 50-500 ppm PCBs of liquid other than mineral oil dielectric fluid, test burn will be required with written approval and public notice as for incinerators.
- 9-12 months.

# Alternative Thermal Methods

- For alternate disposal of PCBs that are required to be incinerated, an approval can be issued tailored to a specific process.
- For thermal emissions, test burn must demonstrate 99.9999% D.E. of PCBs or a PCB surrogate for liquids or solids (even though the six 9s D.E. is for solids only), and/or PCBs less than 2 ppm in residual for thermal or non-thermal.
- Public notice as for incinerators.
- 9-12 months.

# PCB Landfills

- Site visit.
- Application.
- Evaluation of technology.
- Proposed approval.
- Public notice as for incinerators.
- 9-12 months.

# PCB Commercial Storage

- Site visit.
- Application.
- May get exemption from PCB storage approval if RCRA permitted. But, still subject to TSCA rules, inspection, and enforcement.
- Must have closure plan with financial assurance. Financial assurance mechanism reviewed by HQ.
- Public notice as for incinerators.
- 3-6 months.

# Risk-based Clean-ups - 61c, 62c

- Site visit.
- Application defining PCB pathways.
- Qualitative analysis of how remediation proposal will isolate PCB pathways from the environment.
- Proposed approval.
- Public notice as for incinerators.
- 6-9 months.

# R&D Approvals

- For less than 500 gallons or 70 cubic feet of liquid or non-liquid of PCB material with less than 10,000 ppm PCB- only notification is required. We may ask a few questions.
- For greater than above, approval is required. If no potential emissions into environment, no public notice required.

# Alternative Decontamination

- Requests for alternative decontamination usually concern concrete or moveable equipment. Sometimes on sampling.
- Need to do a validation study to confirm performance of new method.
- Approval will define what is acceptable practice.
- No public notice required.

# Questions?

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